

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GÉRARD SILLAM and ALDRIC SAULNIER, :  
Plaintiffs, : No. 21 CV 6675 (CM)(OTW)  
-against- :  
LABATON SUCHAROW LLP and :  
CHRISTOPHER J. KELLER, :  
Defendants. :  
:-----x

**DEFENDANTS' THIRD SET OF DOCUMENT REQUESTS**

PLEASE TAKE NOTICE THAT pursuant to Federal Rules of Civil Procedure 26 and 34 and Rule 26.3 of the Local Rules of the United States District Court for the Southern District of New York, Defendants, Labaton Sucharow LLP ("Labaton") and Christopher J. Keller, by their undersigned attorneys, hereby demand that Plaintiffs, Gérard Sillam and Aldric Saulnier, produce all documents, tangible things, and electronically stored information described below in Plaintiffs' possession, custody, or control for inspection and copying at the offices of Ganfer Shore Leeds & Zauderer LLP, 360 Lexington Avenue, New York, New York 10017, within 30 days of the date hereof.

**DEFINITIONS AND INSTRUCTIONS**

1. The Definitions and Instructions and the definitions of defined terms contained in Defendants' First Set of Document Requests to Plaintiffs, dated July 1, 2022, are incorporated as if set forth in full herein.

2. Any responsive documents that Plaintiffs have previously produced to Defendants in this action need not be produced again, but shall be identified by Bates number in Plaintiffs' responses to these Requests.

3. This Set of Document Requests is not subject to any time limitation.

**DOCUMENT REQUESTS**

1. Documents sufficient to establish whether Plaintiff Sillam has ever been convicted of a crime, whether by the court or tribunal or on a plea of guilty, in France or any other jurisdiction.

2. If Plaintiff Sillam has ever been convicted of a crime, for each conviction, all documents establishing the crime for which convicted, the date and place of conviction, the circumstances of the crime, and the sentence imposed and served.

3. Documents sufficient to establish the outcome with respect to Plaintiff Sillam of each criminal proceeding or investigation in which Plaintiff Sillam was ever named as a respondent, including but not limited to the proceedings numbered 296/1996, 966/2001, 1167/2001, 336/2003, 911/2003, 1103/2003, 1188/2003, 1319/2003, 1264/2005, and 1419/2006, as described on Exhibit "A" attached hereto.

Dated: New York, New York  
January 27, 2023

GANFER SHORE LEEDS & ZAUDERER LLP

By: 

Mark C. Zauderer

Ira Brad Matetsky

Yoram J. Miller

360 Lexington Avenue

New York, New York 10017

(212) 922-9250

(212) 922-9335 (facsimile)

[mzauderer@ganfershore.com](mailto:mzauderer@ganfershore.com)

[imatetsky@ganfershore.com](mailto:imatetsky@ganfershore.com)

*Attorneys for Defendants*

## EXHIBIT A

FRENCH REPUBLIC  
 MINISTRY OF INTERNAL AFFAIRES, OVERSEAS AND  
 TERRITORIAL COLLECTIVITIES  
 GENERAL NATIONAL POLICE DIRECTORATE, PARIS  
 POLICE HEADQUARTERS

UNIT FIGHTING CRIMES AGAINST  
 INDIVIDUALS [BRIGADE DE  
 REPRESSEION DE LA DELINQUANCE  
 CONTRE LA PERSONNE (BRDP)]  
 36 RUE DU BASTION  
 75017 PARIS  
 Tel: 01 87 27 75 00  
 Fax: 01 87 27 75 72  
 INSEE Code:

Minutes no. 2018/000463

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 MATTER:

C/X

SUBJECT:  
 Scope:

Criminal background search  
 Gerard SILLAM

# MINUTES

Minutes no. 02265/2018/000463

In twenty twenty-one,  
 On the seventeenth of March, at twelve forty-five

I, LUDOVIC GARGAUD  
 A POLICE COMMANDER  
 Stationed at the BRDP

JUDICIAL POLICE OFFICER residing in Paris

--- On duty ---

--- Continuing to perform the instructions contained in document no.  
 17354000712 dated 05/16/2018 of Mr. BADORC Yves, DEPUTY PUBLIC  
 PROSECUTOR, with the Law Court of PARIS, ---

--- Continuing the investigation on a preliminary basis, ---

--- Having regard to Articles 75 et seq. of the Criminal Procedural Code, ---

--- It should be noted that it is apparent from the research carried out applying  
 criminal background processing that Mr. Gérard SILLAM, born on August 27, 1960  
 in Sousse (Tunisia), was heard as the respondent in the proceedings numbered: ---

- 296/1996 of the financial unit of the Paris DRPJ [Regional Directorate for the  
 Judicial Police], conducted in connection with bankruptcy and asset concealment  
 assets counts.

- 966/2001, 1167/2001, 336/2003, 911/2003, 1103/2003 and 1188/2003 of the first  
 judicial police district of the Paris DRPJ in connection with a count of fraud as an  
 organized group.

- 1319/2003 of the Pantin police station (93), in connection with a count of fraud.

- 1264/2005 of the Paris DRPJ unit fighting crimes against individuals, in  
 connection with a count of defamation of an individual verbally, through an image, in  
 writing or through digital means.

- 1419/2006 of the second judicial police district, DRPJ of Paris, in connection with  
 a count of prohibited carrying of a weapon, munition or any category one or four  
 related item.

--- I attest to the foregoing. ---

The police commander  
 [seal:] [illegible] PREFECTURE OF [illegible]  
 [signature]



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## CERTIFICATION

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*Authorized Signature:*

Sasha Hodgson  
Sasha Hodgson (Jan 23, 2023 10:16 GMT)

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Name: SASHA HODGSON

Title: Senior Project Manager

Date: 23-Jan-2023

Reason for signature: I approve the accuracy of this document content as written

REPUBLIC FRANCAISE  
MINISTERE DE L'INTERIEUR, DE L'OUTRE-MER ET  
DES COLLECTIVITES TERRITORIALES  
DIRECTION GENERALE DE LA POLICE NATIONALE  
PREFECTURE DE POLICE DE PARIS

BRIGADE DE REPRESSEMENT DE LA  
DELINQUANCE CONTRE LA  
PERSONNE  
36, RUE DU BASTION  
75017 PARIS  
Tel : 01 87 27 75 00  
Fax : 01 87 27 75 72  
Code INSEE :

P. V. : n°2018/000463

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AFFAIRE :  
C/X

OBJET :  
Mention

Recherches antécédents  
Gérard SILLAM

# PROCES-VERBAL

PV n° 02265/2018/000463

L'an deux mil vingt et un,  
Le dix-sept mars, à douze heures quarante cinq

Nous, LUDOVIC GARGAUD  
COMMANDANT DE POLICE  
En fonction à la BRDP

OFFICIER DE POLICE JUDICIAIRE en résidence à Paris

--- Nous trouvant au service, ---

--- Poursuivant l'exécution des instructions contenues dans le soit-transmis n° 17354000712 en date du 16/05/2018 de Monsieur BADORC Yves, PROCUREUR DE LA REPUBLIQUE ADJOINT près le TJ de PARIS, ---

--- Poursuivant l'enquête en la forme préliminaire, ---

--- Vu les articles 75 et suivants du Code de procédure pénale, ---

--- Mentionnons qu'il ressort des recherches effectuées auprès de l'application du traitement des antécédents judiciaires que monsieur Gérard SILLAM, né le 27 août 1960 à Sousse (Tunisie), a été entendu en qualité de mis en cause dans les procédures numéros : ---

- 296/1996 de la brigade financière de la DRPJ de Paris, diligentée des chefs de banqueroute et dissimulation d'actifs.

- 966/2001, 1167/2001, 336/2003, 911/2003, 1103/2003 et 1188/2003 du 1er district de police judiciaire de la DRPJ de Paris, diligentées du chef d'escroquerie en bande organisée.

- 1319/2003 du commissariat de police de Pantin (93), diligentée du chef d'escroquerie.

- 1264/2005 de la brigade de répression de la délinquance contre la personne de la DRPJ de Paris, diligentée du chef de diffamation envers personne par parole, image, écrit ou moyen électronique.

- 1419/2006 du 2ème district de police judiciaire de la DRPJ de Paris, diligentée du chef de port prohibé d'arme, de munition ou de leurs éléments de catégorie 1 ou 4.

---Dont mention. ---

Le commandant de police

